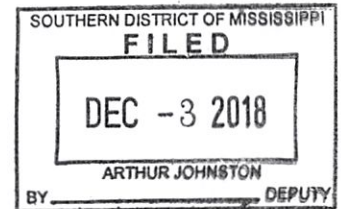


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

DEFENDANT CHARLES LEARY'S
PRO SE MOTION UNDER FED.R.CIV.P. 11, 5, AND
THE COURT'S INHERENT AUTHORITY

COMES NOW Plaintiff by counterclaim **Charles Leary**, appearing *pro se*, and files this his Motion respectfully requesting that the Court impose sanctions under Fed.R.Civ.P. 11, the court's inherent authority, and other remedies under Fed.R.Civ.P. 5 for Handshoe's repeated intentional failure to serve Dr. Leary with pleadings as required. Mr. Handshoe has long been on notice that Leary will seek remedy under Rule 11 for such conduct. Dr. Leary has never received Mr. Handshoe's defense and this is now a pattern. In the alternative, Dr. Leary seeks additional time to file any documents responsive to the defense once it is properly served.

Dr. Leary knows a defense was filed because he received mail from the Court.

A supporting memorandum accompanies this motion.

RESPECTFULLY SUBMITTED, this the 30 day of November, 2018.

A handwritten signature in blue ink, appearing to be 'CL' with a long horizontal stroke extending to the right.

CHARLES LEARY, DEFENDANT

appearing *pro se*


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Canada

802-440-0213
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CERTIFICATE OF SERVICE

I hereby certify that, on 11/30, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary